

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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MRS. UNITED STATES NATIONAL PAGEANT,  
INC.,

Plaintiff,

v.

STEPHANIE L. WILLIAMS, CROWN GARLAND  
LLC, and COSMOS INTERNATIONAL  
PAGEANTS, INC.,

Defendants.

**NOTICE OF MOTION FOR  
PARTIAL SUMMARY  
JUDGMENT**

Case No. 6:18-CV-06587

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STEPHANIE L. WILLIAMS, CROWN GARLAND  
LLC, and COSMOS INTERNATIONAL  
PAGEANTS, INC.,

Third-Party Plaintiffs,

v.

ANTHONY ILACQUA,

Third-Party Defendant.

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**PLEASE TAKE NOTICE** that Plaintiff, Mrs. United States National Pageant, Inc., and Third-Party defendant Anthony Ilacqua, by their attorneys, Adams Leclair LLP, shall move this Court,

Upon the Attorney Declaration of Paul L. Leclair, dated December 10, 2021; the Declaration of Anthony Ilacqua dated December 9, 2021; the Declaration of William Mellon dated December 10, 2021; the Declaration of Emily Simmons, dated August 27, 2018; the Declaration of Katy Moody Cusick, dated August 27, 2018; the Declaration of Shena Dixon Mason, dated August 27, 2018; the Declaration of Molly Lewellen, dated August 27, 2018; the Declaration of Amy Demanchick, dated December 10, 2021; Plaintiff and Third-Party

Defendant's Appendix to Local Rule 56 Statement of Facts, with exhibits A through LL, including without limitation the excerpt of the transcript of the deposition of Stephanie L. Williams, individually and as a Fed. R. Civ P. 30(b)(6) witness for Crown Garland, LLC and Cosmos International Pageants, Inc.; the Local Rule 56(A)(1) Statement of Undisputed Material Facts; and the accompanying Memorandum of Law,

Before Honorable Marian W. Payson, at the U.S. Courthouse, 100 State Street, Rochester, New York, 14614, at a date and time to be determined by the Court, pursuant to Fed. R. Civ. P. 56 for partial summary judgment in favor of Plaintiff on liability for its claims for breach of contract, tortious interference with contracts, tortious interference with prospective contractual relations, trademark infringement (15 U.S.C. § 1114), trademark infringement (15 U.S.C. § 1125), trademark infringement (New York General Business Law §§ 360-K, 360-L, 360-M), unfair competition, New York General Business Law § 349, injurious falsehood, and conversion;

And for summary judgment against defendants/third-party plaintiffs Stephanie L. Williams ("Williams"), Crown Garland, LLC ("Crown Garland"), and Cosmos International Pageants, Inc. ("Cosmos") dismissing their amended counterclaims and third-party claim [Dkt 45] in their entirety for breach of oral agreement, unjust enrichment, and tortious interference; and ordering such other relief as the Court deems just and proper.

Pursuant to Local Rule 7(a)(1), Plaintiff intends to file and serve reply papers.

Dated: December 10, 2021

**ADAMS LECLAIR LLP**

s/ Stacey E. Trien  
Paul L. Leclair, Esq.  
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